



UNITED STATES OF AMERICA  
Federal Trade Commission  
Washington, D.C. 20580

August 6, 2024

**VIA ECF**

Hon. Jennifer L. Rochon  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1920  
New York, NY 10007

Re: Federal Trade Commission v. Tapestry, Inc., et al., Case No. 1:24-cv-03109-JLR

Dear Judge Rochon:

Pursuant to this Court's Rule of Individual Practice 4(B)(iii) and Paragraph 9 of the Stipulated Protective Order, Dkt No. 70 (the "Protective Order"), the Federal Trade Commission ("FTC") respectfully submits this letter motion seeking an order sealing portions of the Motion for Preliminary Injunction ("Motion").

The information the FTC seeks to redact in the Motion references information designated confidential by Tapestry Inc., Capri Holdings Limited, and/or third parties. In designating the information confidential, Tapestry Inc., Capri Holdings Limited, and/or third parties asserted that the information is commercially and competitively sensitive and that they will be harmed by its disclosure.

To comply with the Protective Order, the FTC respectfully requests that this letter motion be granted in its entirety and an Order be issued sealing portions of the Motion and accompanying Exhibits.

The FTC further asserts that it complied with this Court's Rule of Individual Practice 4(B)(iii) by notifying, and meeting and conferring with, counsel for Tapestry and Capri and third parties to inform them of the FTC's intention to file confidential information with its Motion and of this Court's Rule of Individual Practice 4(B)(iii) requiring them to file letter motions to seal within three days of the Motion. The FTC respectfully requests guidance from the Court as to whether Paragraph 9 of the Protective Order obviates the need for compliance with this Court's Rule of Individual Practice 4(B)(iii).

Respectfully submitted,

S/ Abby L. Dennis

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cc: All Counsel of Record (via ECF)